

**EXPERT ROBERT J. WOOLSEY, JR.
(Liability)**

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R. James Woolsey

EXHIBIT 156

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 NORFOLK DIVISION
4 -----X

5 OLIVIA RUX., et al., :
6 Plaintiffs : Civil Action No.
7 : 2:04CV428
8 v. :
9 : PAGES 1 through 34

10 THE REPUBLIC OF THE :
11 SUDAN, :
12 Defendant :

13 -----X

COPY

14
15 Videotaped Deposition of R. James Woolsey
16 Washington, DC
17 Wednesday, June 22, 2005
18
19
20

21 Reported by: Joanne Liverani, RMR

22 JOB NO. 168034

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4

June 22, 2005

5

9:34 a.m.

6

7 Videotaped Deposition of R. James Woolsey, held at the
8 offices of:

9

10 Greenberg Traurig LLP

11 800 Connecticut Avenue, Northwest

12 Suite 500

13 Washington, DC 20006

14

15 Pursuant to notice, before Joanne Liverani, RMR, a

16 Notary Public of the District of Columbia.

17

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1 APPEARANCES:

2 For the Plaintiffs, OLIVIA RUX, ET AL.

3 Hall, David & Joseph

4 1428 Brickell Avenue

5 Miami, Florida 33131-9133

6 (305)374-5030

7 BY: Andrew Hall, Esq.

8

9 Also Present:

10 Douglas Farah, Consultant - Analyst

11 Jonathan Perry, Videographer

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		Court of Canada, In relation to	
8		Mohamed Zeki Mahjoub	
9	2	Patterns of Global Terrorism 2000, US	30
		State Department, April 2001	
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1 VIDEOPHOTOGRAPHER: This is tape
2 number one of the videotaped deposition of R. James
3 Woolsey taken in the matter of Rux versus Republic
4 of Sudan. We are at the offices of Greenberg
5 Traurig, 800 Connecticut Avenue, Northwest,
6 Washington, DC. Today's date is June 22, 2005.
7 The time on the video screen is currently 9:34 and
8 16 seconds a.m. My name is Jonathan Perry. I am
9 the videographer from Esquire Deposition Services.
10 The court reporter is Joanne Liverani, also from
11 Esquire Deposition Services.

12 Will counsel present please introduce
13 themselves and state whom they represent.

14 MR. HALL: My name is Andrew
15 Hall, I represent the plaintiffs in this matter.
16 By way of beginning, the -- a lawyer, Gregory
17 Stanton, just filed a notice of appearance in this
18 matter last week. Mr. Stanton sent my colleagues
19 and not me a letter requesting that we cancel all
20 depositions that were set, but in light of the
21 court's pending order for final hearing, we aren't
22 able to accommodate that request. I informed

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1 Mr. Stanton of that information verbally this past
2 Friday and in letter -- in a letter yesterday, in
3 prompt response to his, we normally wait some more
4 time for him to arrive. He is late. But in light
5 of his letter, and in light of everything else
6 that's going on, and more importantly in light of
7 Mr. Woolsey's very tight schedule, we are unable to
8 accommodate further delay. So let's proceed.

9 VIDEOGRAPHER: Have the reporter
10 swear in the witness, please.

11 Thereupon,

12 ROBERT JAMES WOOLSEY, JR.,
13 the Witness, called for examination by counsel for the
14 Plaintiffs, and, after having been sworn by the notary,
15 was examined and testified as follows:

16 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS, OLIVIA RUX,
17 ET AL.

18 BY MR. HALL:

19 Q Please state your full name.

20 A Robert James Woolsey, Jr.

21 Q Mr. Woolsey, what is your business
22 address?

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1 A 8283 Goldsboro [sic] Drive, McLean,
2 Virginia. I am a vice president of Booz Allen
3 Hamilton consulting firm.

4 Q And, would you provide me, sir, with
5 your educational background starting with your
6 attendance in public schools?

7 A I attended the public schools of Tulsa,
8 Oklahoma, graduating from Tulsa Central High School
9 in 1959. I received a bachelors of arts degree
10 from Stanford University in 1963; a masters from
11 Oxford University in England, in 1965; and a law
12 degree from Yale University Law School in 1968.

13 Q Would you please, sir, tell us whether
14 or not you distinguished yourself through any
15 awards or honors or achievements at Stanford?

16 A I graduated Phi Beta Kappa with great
17 distinction from Stanford.

18 Q And, what does "great distinction" mean
19 in that system?

20 A It's in the top few percent of
21 graduates, I don't know, I imagine around the top
22 5 percent.

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1 Q Did you distinguish yourself while you
2 were taking your masters at Oxford?

3 A I attended there on a Rhodes
4 Scholarship, got a degree in philosophy, politics,
5 and economics, and then returned to law school.

6 Q Would you tell us what a Rhodes scholar
7 is?

8 A It is a student who is selected, one of
9 about 100 a year, from United States, Germany, and
10 former British Commonwealth, pursuant to a trust
11 established by Cecil Rhodes. Scholarships began
12 around 1903 -- 1904, at the beginning of the
13 twentieth century. It is a competitive scholarship
14 based on academics, and to some extent on service
15 and -- and athletics, depending on the panel that's
16 doing the selecting.

17 There are about 30 -- I think there's 32
18 Americans of the hundred some every year.

19 Q Were you at Oxford when President
20 Clinton was obtaining his time there?

21 A No, no. I did not know President
22 Clinton until he declared for the presidency. He's

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1 five years younger than I, so he was actually still
2 in high school when I began Oxford.

3 Q Did you distinguish yourself while
4 attending Yale Law School?

5 A I was managing editor of the Yale Law
6 Journal.

7 Q And, could you tell us what that means?

8 A A small percentage of the classes
9 selected usually either by grades or by writing
10 ability to edit the law school's legal publication.
11 At Yale it's called the Yale Law Journal, and I was
12 the managing editor of that journal.

13 Q Could you describe for us your work
14 experience?

15 A In -- as soon as I graduated from law
16 school, I went on active duty in the US Army. I
17 had a ROTC commission. I was assigned to the
18 Pentagon to work on intelligence matters in the
19 Office of the Secretary of Defense. I worked on
20 those matters for about nine months, and then I
21 began working directly for former deputy Secretary
22 of Defense, Paul Nitze, who had returned in March

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1 of 1969 to head up arms control work for the
2 Pentagon.

3 I accompanied him to Helsinki and Vienna
4 as an adviser on the delegation to the strategic
5 arms limitation talks with the Soviet Union. I
6 worked for him until the summer of 1970, when I
7 finished my two years active duty in the Army.

8 I was assigned for a six-month period,
9 agreed to work for a six-month period in the
10 National Security Council Staff, helping on arms
11 control matters.

12 I left right at the end of 1970, to
13 become general counsel of the Senate Armed Services
14 Committee, a post I held for three years, until in
15 late 1973, I moved to Shea and Gardner law firm as
16 an associate. I practiced law there until late
17 1976 when I served on the transition team for the
18 incoming Carter administration. I was asked to
19 serve as undersecretary of the Navy, in the Carter
20 administration, and was nominated, confirmed by the
21 Senate, served in that job for three years until
22 late 1979, when I returned to Shea and Gardner, as

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1 a partner.

2 Practiced law at Shea and Gardner
3 through the 1980s, until 1989, for three years
4 during that time, in the mid-1980s, from '83 to '86
5 I was appointed by President Reagan to be
6 delegate-at-large to the Arms Control negotiations
7 with the Soviets in Geneva on nuclear and space
8 weapons.

9 That was a part-time undertaking. I did
10 that on a continual basis for some number of weeks
11 a year. In -- from '83 to '86.

12 In 1989 I was nominated by President
13 Bush, 41, to be the ambassador and negotiator for
14 the Conventional Forces in Europe Treaty in Vienna.
15 I took over those negotiations in early November of
16 1989. I concluded them successfully, and the
17 treaty was approved by the Senate for ratification
18 in the summer of '91.

19 I returned to my law firm in late
20 summer/early fall of 1991, to Shea and Gardner. I
21 practiced law until early 1993. I was asked by
22 President -- then President-elect Clinton to serve

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1 as Director of Central Intelligence. I served in
2 that position from early February of '93 to early
3 January of '95. Resigned, went to my -- back to my
4 law firm, where I practiced from early '95 until
5 the summer of 2002. My practice in those years at
6 Shea and Gardner was the fields of civil litigation
7 and alternative dispute resolution, particularly
8 arbitrations -- commercial arbitrations.

9 I went in 19 -- summer of 2002, to Booz
10 Allen Hamilton, large international consulting
11 firm, where I work today as a partner and vice
12 president on issues related to counterterrorism,
13 law enforcement, counterintelligence, continuity of
14 government and continuity of operations of
15 government departments.

16 Q If we were to talk about the overall
17 period of time involving government, how much time,
18 how many years have you spent in which the issue of
19 terrorism and counterterrorism, including your
20 current job, has been a focus of your work?

21 A Well, I would say only the two years at
22 the CIA of the full-time government work was

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1 focused in important measure on terrorism and
2 counterterrorism. And then, the years since 2002,
3 the last three years, I have worked on those issues
4 a good deal while at Booz Allen Hamilton.

5 During the '90s, after early '95, until
6 the summer of 2002, I followed these issues
7 principally through the press and through
8 friendships with various people who were working on
9 them and discussing them, but there was an
10 extracurricular matter.

11 Q Are you generally familiar with the
12 attack and resulting deaths of 17 sailors on the
13 USS Cole in October 2000?

14 A Yes.

15 Q How did you become familiar with that
16 event?

17 A Through the press.

18 Q Now, sir, we've asked you to come here
19 to provide your opinion by way of deposition
20 testimony, and you've agreed to do this without
21 subpoena and without compensation; is that correct?

22 A That's correct.

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1 Q And we've provided some materials for
2 you to familiarize yourself with, and go over, in
3 anticipation of your deposition, and I would like
4 to go over those with you briefly

5 A Yes.

6 Q Let me hand you first a document that
7 was filed by Canadian Intelligence in the Federal
8 Court trial division in the matter of, quote: A
9 certificate issued pursuant to Section 40.1 of the
10 Immigration Act, and -- and the application of
11 Muhammad Zeki Mahjoub, and ask you if that was one
12 of the documents we had provided to you?

13 A Yes.

14 MR. HALL: Let's mark that as Exhibit 1,
15 please.

16 (Woolsey Exhibit No. 1 - multipage document
17 re The Federal Court of Canada, In relation
18 to Mohamed Zeki Mahjoub - was marked for
19 identification.)

20 BY MR. HALL:

21 Q We've also provided to you a book and an
22 opportunity to meet and speak with Douglas Farah

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1 and the book authored by Mr. Farah, "Blood From
2 Stones"; is that correct, sir?

3 A That's correct.

4 Q And we have, in addition to that, we
5 have provided to you sections from the official
6 publication of the United States State Department
7 called Patterns of Terrorism?

8 A That's correct.

9 Q And I want to go through the information
10 that we've provided to you, specifically, sir.

11 Turning, first of all, to the report
12 that was filed in the Federal Court of Canada, in
13 relation to Mohamed Zeki Mahjoub -- Mahjoub,
14 rather. Are there several references in that
15 report that are of significance to you in your
16 expert opinion regarding the issues of Sudan and
17 it's relationship to terrorist support?

18 A Yes, I remember a couple. You should
19 point me to the --

20 Q Yes, let's start with Page 15.

21 On Page 15, Paragraph 20, the AJ
22 terrorist, that is the Egyptian jihad, terrorist

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1 training camps are located in Sudan, Bosnia, and
2 Afghanistan. And in Sudan, Bosnia AJ camps are
3 financed by Saudi dissident and terrorist financier
4 Osama Bin Laden. In addition, Al-Zawaheri has met
5 with leaders of Sudanese, Eritrean, Ugandan, Yemeni
6 and Egyptian Islamic groups. In May of 1998, these
7 leaders agreed to build training camps in new areas
8 inside Sudan. One example of training in the
9 United States has been uncovered.

10 That section was provided to you?

11 A That's correct.

12 Q Now, is this the type of report that
13 you, from the Canadian Intelligence authorities,
14 which was filed in an immigration proceeding in a
15 court in Canada, the type of document that you as
16 an expert in terrorism, counterterrorism during
17 your days at the CIA would rely on?

18 A It is an unclassified version of the
19 kind of material that we relied on. Canadian
20 Intelligence, CSIS is a small but -- but fine
21 intelligence service, and the cooperation of course
22 between American and Canadian intelligence was very

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1 close, has been for many years, and certainly was
2 during the two years I was director of Central
3 Intelligence, so the document that they prepared
4 and authorized for disclosure I would have great
5 confidence in.

6 Q Now, on page, I believe it is 20 and 21,
7 there are some further references that I would like
8 to point to your attention concerning Sudan.

9 On Paragraph 28 --

10 MR. FARAH: 26.

11 MR. HALL: I'm sorry, let's go
12 earlier.

13 BY MR. HALL:

14 Q Paragraph 26: A 1998 agreement between
15 Al-Zaw -- Al-Zawaheri and leaders of the Sudanese,
16 Eritrean, Ugandan, Yemeni, and the Egyptian Islamic
17 groups established budgets -- budgets for financing
18 international terrorist operations and plans to
19 mobilize officials in Sudanese embassies in London,
20 Sanaa, New York, Rome, Karachi, and Mogadishu.

21 Is it significant, sir, that there would
22 be an agreement to use Sudanese embassies in 1998,

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1 in terms of being able to facilitate acts of
2 terrorists?

3 A Yes, I believe so. Because this is
4 after Bin Laden left his residency in Sudan and
5 moved to Afghanistan in '96, so I believe it is
6 significant that his number two, Al-Zawaheri and
7 leaders of Sudanese and other Islamic groups are
8 establishing budgets, and operations, and financing
9 operations and plans to mobilize officials in
10 Sudanese embassies in several countries.

11 Q I want to continue in the same
12 paragraph, sir, in the intelligence report provides
13 quote: These leaders also agreed at the meeting to
14 open Sudan's doors to international Islamic
15 fund-raising organizations and to facilitate the
16 movement of extremists, by providing them a
17 Sudanese diplomatic passports.

18 What is the relationship of that type of
19 support to an organization like al-Qaida in being
20 able to implement an attack on the Cole?

21 A Well, it's extremely important for an
22 international terrorist operation to be able to

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1 have such things as even passports, but certainly
2 diplomatic passports, which would permit them to
3 move material without scrutiny in a number of
4 circumstances, and would, I think, be quite helpful
5 in helping them prepare to -- for any terrorist
6 attack.

7 Q Let me show you also, sir, the -- from
8 patterns of terrorism, which is the 2000 report,
9 ~~and~~ I am going to hand that to you and ask the
10 reporter to mark that as Exhibit 2.

11 MR. HALL: We will do the
12 marking after the deposition is over, so that we
13 don't interrupt the flow of the witness's
14 testimony.

15 BY MR. HALL:

16 Q On Page 35 of that report, which is an
17 official United States State Department
18 publication, there is a reference to Sudan, the
19 pertinent parts of which say, as follows: The
20 United States and Sudan in mid-2000 entered into a
21 dialogue to discuss US counterterrorism concerns.
22 The tasks, which were ongoing at the end of the

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1 year were constructive and obtained some positive
2 results. By the end of the year Sudan had signed
3 all 12 international conventions for combating
4 terrorism and taken several other positive
5 counterterrorism steps, including closing down the
6 Popular Arab Islamic Conference which served as a
7 forum for terrorists.

8 Let me ask you, sir, prior to closing
9 this down in 2000, at the end of 2000, were you
10 familiar with the annual meeting of terrorists that
11 occurred in Sudan, at the Popular Arab and Islamic
12 Conference in --

13 A Yes. This was taking place in -- under
14 this name or some other, in the -- at least one of
15 the years I was Director of Central Intelligence in
16 the early '90s. And, we used to call it sort of
17 the terrorist equivalent of the Paris Air Show.

18 It was really quite remarkable. Those
19 of us working in US intelligence thought that Sudan
20 would be this blatant in pulling all of these
21 terrorist organizations together in an annual
22 conference.

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1 Q Now even after closing down the
2 conference, this report continues: Sudan continued
3 to be used as a safe haven for members of the
4 various groups including associates of Osama Bin
5 Laden's al-Qaida organization, Egyptian AL-Gama's
6 al -- and I can't pronounce the term.

7 A Islamiyya.

8 Q Thank you.

9 Egyptian's Islamic Jihad, the Palestine
10 Islamic Jihad, and Hamas. Most of the groups used
11 Sudan primarily as a secure base for assisting
12 operations elsewhere.

13 So, sir, can you help me with that and
14 tell me what the significance of Sudan's allowing
15 itself to be used as a safe haven and safe base for
16 operations elsewhere?

17 A Well, I would say the significance of
18 this situation, as of the end of 2000, in this
19 April 2001 State Department document, is that Sudan
20 has made something of a transition to try to give a
21 less terrorist friendly impression to the rest of
22 the world, but still is permitting itself to be

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1 used as a safe haven by al-Qaida and other
2 terrorist organizations, so it has gone to some
3 extent from overt to slightly less overt assistance
4 to these terrorist groups.

5 Q And in terms of Sudan and Yemen, is
6 there a common border between these two countries?

7 A Well, there's the sea, right across
8 the -- right across the Gulf of Aden. It is very,
9 very close.

10 Q Right. And in terms of being able to
11 provide terrorists operating in Yemen, for example,
12 with regard to the attack on the Cole, is there a
13 path that runs from Sudan over?

14 A It's a very short trip by Dow across
15 that Gulf of Aden, I would -- I would think.

16 Q Yes, sir. Now, let me show you a --
17 a -- quote a passage from Douglas Farah's book. He
18 fortunately is with us today, so -- and he has had
19 a chance to talk to you this morning; has he not?

20 A Yes.

21 Q And in that, the passage talks about the
22 movement of gold.

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1 A Yes.

2 Q And specifically the passage starts on
3 Page 125. Let me hand that to you, sir.

4 A Mm-hmm.

5 Q And, this is again --

6 A Yes, I read this just before the
7 deposition this morning.

8 Q -- and this is again, post the Osama Bin
9 Laden, this is as late as 2001 and 2002?

10 A This is, according to its text, in the
11 summer of 2002.

12 Q What is the significance -- can events
13 like that described in this section, that is to say
14 flying in plane loads of products with gold
15 intermixed in them, occur in Sudan without the
16 active knowledge and permission of the government?

17 A Assuming this is correct, and I have no
18 reason to believe otherwise, I think the answer to
19 the question is it's not reasonable to assume that
20 shipments of this sort would come without the
21 permission and acquiescence of the Sudanese
22 government.

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1 There was then and still is to some
2 extent -- there was a civil war. There is now a --
3 for the time being settled civil war, but
4 nonetheless, a great deal of hostility against the
5 Sudanese government in the south, in -- among
6 Christian and animist tribes that are not Muslim,
7 but these types of flights and this type of
8 trafficking would not find support or safe haven
9 among the followers of John Garang and the rebels
10 against the Khartoum government in the south and in
11 the rest of the country, where the government's
12 writ runs, this is not the sort of thing that would
13 be undertaken successfully without the government's
14 acquiescence.

15 Q And from all of this information, is it
16 your view that the government of Sudan is still,
17 although more covertly than in the mid-'90s,
18 involved in support -- providing support to
19 al-Qaida and safe haven to its operatives?

20 A As of this period of -- of time, of late
21 2000, I believe that the State Department report,
22 the Canadian Intelligence declassified report, and

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1 unrefuted information, such as that included in
2 Douglas Farah's book, strongly suggest Sudanese
3 government acquiescence and continued acquiescence
4 and assistance to groups like al-Qaida and to
5 al-Qaida in particular.

6 There has been a good deal of
7 controversy about the question whether al-Qaida, a
8 Sunni Islamist organization, would work with Shiite
9 groups, such as the -- let's say the intelligence
10 services of the nation of Iran or with secular
11 government organizations, such as intelligence
12 organization for Baathist Iraq.

13 But, I think those connections have been
14 demonstrated to exist, and with respect to al-Qaida
15 connections with Sunni Islamist Sudan, there is no
16 ideological or religious tensions really that would
17 gainsay cooperation between Sudanese government and
18 the -- and al-Qaida, as of that time, so my
19 judgment, given the information I've seen here, and
20 given my understanding of the propensities of these
21 types of organizations in that part of the world,
22 I'd say it's quite likely that there was

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1 cooperation between Sudanese government
2 principally, probably through its intelligence
3 services and al-Qaida, as of late 2000.

4 Q Now, in terms of -- we've talked about
5 things like the actual presence of a training camp.
6 I believe that was in the -- one of the documents
7 from the Canadian report on Page 15. I think we
8 found that earlier.

9 A Yes, I think that's right. It says as
10 of the time of the Canadian document, which is, as
11 I understand it, early 2001, pre-9/11, in Sudan and
12 Bosnia, AJ, Al-Jihad camps are financed by Saudi
13 dissident and terrorist financier Osama Bin Laden.

14 Q And, they're--they're in Sudan, these
15 camps?

16 A Yeah, that's what it says, in Sudan.

17 Q And of course we made you aware of the
18 fact that Osama Bin Laden has several active
19 businesses that are generating funds that are used
20 by Osama Bin Laden for his al-Qaida efforts in
21 Sudan at this time?

22 A Well, I recall from press reports

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1 that -- and I've seen it here this morning, that
2 even after he left his residence in Sudan in '96 to
3 move to Afghanistan, he had business interests, the
4 one I recall is construction. That was a business
5 his father was in in Sudan.

6 Q Right. Now, let me just see if I can
7 wrap it up very quickly, because you have been kind
8 enough to give us this hour, and I don't want to
9 overstay the time or actually it's a half-hour but
10 I wanted -- I promised you I would get done with
11 you as quickly as we -- as time permitted, so last
12 area, sir.

13 Has providing economic support a basis
14 for training terrorism -- terrorists, false
15 documentation, including passports for members of
16 al-Qaida, assistance through the embassies of
17 Sudan, assisted al-Qaida in its success in
18 performing its jihads and its attacks against
19 American interests throughout the world, and
20 particularly attack of the Cole?

21 A And that is, what you just read --

22 Q Is my question.

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1 A -- is a question.
2 Q Assume --
3 A Read it -- read it.
4 Q Let me go through --
5 A All right.
6 Q -- I will put it in front of you --
7 A All right.
8 Q -- so we can go through it together.
9 A All right.
10 Q Has providing economic support provided
11 training camps and a basis for training of
12 terrorists, false documents for members of
13 al-Qaida, including identities on passports, and
14 assistance through the embassies of Sudan, has
15 that -- have those support measures assisted
16 al-Qaida in its success in performing jihads
17 through attacks against American interests
18 throughout the world, in particular the Cole?
19 A Based on the Canadian report we have
20 here, the State Department reports, and the Douglas
21 Farah material, which as far as I know is
22 unrefuted, I would say yes, that's a fair judgment.

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1 Q And would it be as easy for al-Qaida to
2 have launched the attack on the Cole without the
3 support of Sudan?

4 A It would not have been as easy. It
5 might have been possible, but it would not have
6 been as easy. The proximity of Sudan to -- to
7 Yemen, the need for a protected logistics
8 infrastructure, the confused situation in the
9 government of Yemen at the time all suggest to me
10 that the amount of explosives that needed to be put
11 in the boat that attacked the Cole, all that
12 suggests to me that the logistical support and base
13 of operations that could have been available in
14 Sudan could have been of substantial assistance to
15 an attack in Yemen, such as one that occurred.

16 Q It's your opinion that that is a -- is a
17 more likely than not source of those materials?

18 A I believe that to be the case. More
19 likely than not is a fair way to put it.

20 MR. HALL: Thank you. That's
21 all I have.

22 VIDEOGRAPHER: The time is

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1 10:03. We are going off the record. This is the
2 end of tape number one and the end of today's
3 deposition.

4 (Woolsey Exhibit No. 2 - Patterns of Global
5 Terrorism 2000, US State Department, April
6 2001 - was marked for identification.)

7 (Thereupon, at 10:05 a.m. the deposition was
8 concluded.)

9 (The witness reserved signature.)
10
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ACKNOWLEDGMENT OF DEPONENT

6

7

I, R. James Woolsey, do hereby acknowledge I have
8 read and examined the foregoing pages of testimony, and
9 ~~the~~ same is a true, correct and complete transcription
10 of the testimony given by me, and any changes and/or
11 corrections, if any, appear in the attached errata sheet
12 signed by me.

13

14

15 Date

R. James Woolsey

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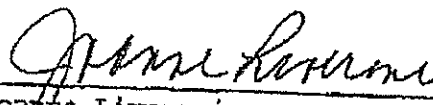
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CERTIFICATE OF NOTARY PUBLIC

I, Joanne Liverani, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.


Joanne Liverani,

Registered Merit Reporter
and Notary Public for the
District of Columbia

My Commission expires:

19 July 31, 2005

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1

Andrew Hall, Esq.

2 Hall David & Joseph

1428 Brickell Avenue

3 Miami, Florida 33131-9133

4 IN RE: RUX V. SUDAN

DEPO OF: R. JAMES WOOLSEY

5

6

Dear Mr. Hall:

7

8 Enclosed for review is your original and copy of the
9 above referenced deposition. Please have the deponent
10 read the transcript and sign the enclosed certificate of
11 deponent. Also enclosed is an errata sheet which the
12 deponent should use to note corrections and the reasons
13 for such corrections. This and any additional errata
14 sheets should be signed and dated by the deponent.

11

12 The deponent has thirty days in which to read and sign
13 the transcript. After the deponent has reviewed the
14 copy of the transcript, please return the certificate of
15 deponent and any errata sheets to 1020 19th Street,
16 Northwest, Suite 620, Washington, D.C. 20036.

14

Sincerely,

15

16

17

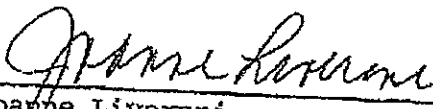
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Case Name: RUX V. SUDAN

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6 Job No.: 168-34

7 Page No. Line No. Change

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613 992 6858 P.02/41

Court File DES-1-00

FEDERAL COURT - JUDICIAL DIVISION

IN THE MATTER OF a certificate issued pursuant
to Section 40.1 of the *Immigration Act, R.S.C.*
1985, c.1 (the *Act*)

AND IN THE MATTER OF an application pursuant to
subsection 40.1(3) of the *Act*

Mohamed Zaki MAHMOUD

RE: SILENCING OF INFORMATION
PARAGRAPH 1(4) OF THE IMMIGRATION ACT

EXHIBIT

Woolsey 1
26-22-05

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The FEDERAL COURT of CANADA
In relation to Mohamed Zeki MAHJOUB

NOTE: Names contained in this report are taken from open information sources and in many cases have been spelled phonetically. As a result these names may appear differently in various references, and may differ from spellings used in practice by these individuals and law-enforcement or intelligence agencies.

Statement Summarizing pursuant to section 40.1(1) of the *Immigration Act*

INTRODUCTION - POSITION OF CSIS

1. The Canadian Security Intelligence Service, hereinafter referred to as "the Service", believes that the person known as Mohamed Zeki MAHJOUB¹ is a high-ranking member of an Egyptian Islamic terrorist organization, the Vanguard of Conquest (VOC)², a radical wing of the Egyptian Islamic Jihad or Al Jihad (AJ). The AJ is one of the groups which split from Egypt's Muslim Brotherhood (MB) in the 1970s to form a more extremist and militant organization. The AJ advocates the use of violence as a means to establish an Islamic state in Egypt.³

2. Service investigation subsequently revealed that MAHJOUB is a highly placed member of the VOC who maintains contact with other AJ / VOC

¹ Mohamed Zeki MAHJOUB is also known as Abu Ibrahim alias Muhammad Zaki Muhammad Mahjub. References A76 p.1, A92 pp.1-2, A93 p.1, A98 p.2.

² The AJ is an Islamic organization attempting to overthrow the current government of Egypt, while the VOC is a faction of the AJ. The VOC is known in Arabic as Tala'a El Fatah. See paragraphs 12 to 15.

³ Reference A1 p.1.

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In relation to Mohamed Zeki MAHJOUB

members around the world. MAHJOUB has been convicted in absentia in Egypt for his involvement with the AJ and sentenced to 15 years in prison (see paragraph 15).

3. The Service believes that MAHJOUB is a member of the inadmissible classes described in paragraphs 19(1)(e)(ii), 19(1)(e)(iv)(B), 19(1)(e)(iv)(C), 19(1)(f)(ii) and 19(1)(f)(iii)(B) of the *Immigration Act* (see Appendix "A"). This report sets out the Service's grounds to believe that Mohamed Zeki MAHJOUB:

- a) will, while in Canada, engage in or instigate the subversion by force of the government of Egypt;
- b) is a member of the VOC, an Al Jihad faction, an organization that there are reasonable grounds to believe will engage in or instigate the subversion by force of the government of Egypt, and will engage in terrorism;
- c) is and was a member of the VOC, an Al Jihad faction, an organization that there are reasonable grounds to believe is, or was engaged in terrorism; and
- d) has engaged in terrorism.

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PART I

EGYPTIAN ISLAMIC JIHAD / AL JIHAD (AJ) AND
THE VANGUARDS OF CONQUEST (VOC)

A. BACKGROUND

i) Egyptian Islamic Jihad / Al Jihad (AJ)

4. The AJ was founded in 1973⁴ by Abboud al-Zummar, an army officer, and Muhammad Abdul Salam Faraj, an Islamic ideologue, and consists of followers of a blind Islamic spiritual guide, Sheikh Umar Abd al-Rahman^{5, 6}. The group, whose name is Al Jihad and which means in the Arabic language, "fighting in the way of God",⁷ descended ideologically from the Muslim Brotherhood (MB), a mainstream Islamic organization founded in Egypt in the 1920s.⁸ The AJ claims to offer a remedy for Egypt's social, economic and political problems by seriously challenging the Egyptian regime.⁹ The group employs terrorism as part of a wider campaign to root

Reference A2 p.2.

⁵ Sheikh Umar Abd al-Rahman is the spiritual leader claimed by both Al Jihad and Al-Gama'a al-Islamiyya (AGAI), another Egyptian Islamic terrorist group. Rahman was sentenced to life imprisonment for his involvement in the 1993 bombing of the World Trade Centre in the United States and for an assassination conspiracy and bomb plot which targeted major New York City sites. Rahman is currently at the Rochester Prison, Minnesota, United States. References A1 pp.4-5, A4, A110 pp.1-2.

⁶ References A1 p.5, A3 p.2.

⁷ Reference A5.

⁸ Reference A1 p.1.

⁹ Reference A1 p.3.

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out Western secular influences and create an Islamic state in Egypt by overthrowing the current government.¹⁰

5. The AJ's ideology includes the view that its struggle against a regime it views as heretical and hostile to Muslims is based on Islamic justice.¹¹ As recently as March 2, 1998, the AJ issued a statement entitled: "No solution except through Jihad". The statement reinforced the group's position that Jihad - "holy war", or armed struggle - is the only way to achieve its goals.¹²

6. The AJ began its major terrorist activities in the late 1970s.¹³ In 1979, Sheikh Umar Abd al-Rahman, the spiritual mentor of the AJ,¹⁴ issued a religious edict condemning Egyptian President Anwar Sadat as an infidel.¹⁵ On October 6, 1981, President Sadat was assassinated by four AJ members.¹⁶

¹⁰ References A1 p.1, A6.

¹¹ Reference A7.

¹² Reference A8 p.1.

¹³ Reference A3 p.1.

¹⁴ References A3 pp.2-3, A27 p.1.

¹⁵ Reference A1 p.3.

¹⁶ Reference A1 p.5.

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7. The Islamic revolution that the AJ hoped to stimulate with Sadat's assassination failed to materialize.¹⁷ Towards the end of the 1980s, the AJ was significantly weakened by mass arrests of its members, government infiltration of its ranks, and the departure of some of the leaders and many followers to Afghanistan to fight the Russian occupation.¹⁸

8. The return of group members from Afghanistan led to a rejuvenation of the AJ and an escalation of AJ terrorist activities including targeting of senior government, military and police officials.¹⁹ In November 1995, the AJ executed a suicide car bomb operation against the Egyptian Embassy in Islamabad, Pakistan, killing 17 people and injuring 59 others.²⁰

9. In 1997, calls by jailed AJ founder Abbud al-Zummar for a unilateral and unconditional cease-fire and an end to militant violence,²¹ were rejected by Ayman Al-Zawaheri, the one-time leader, or *amir*, of the AJ and of the VOC.²² The AJ subsequently continued its calls to overthrow the regime in Egypt, and expressed

¹⁷ References A1 pp.5-6.

¹⁸ References A11 p.1, A12 p.1, A13 p.2.

¹⁹ Reference A1 pp. 3 and 6.

²⁰ Reference A1 p.6.

²¹ References A7, A16 p.1.

²² References A3 p.4, A7. See paragraph 12.

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support for attacks on tourists, who it claims are targeted because of their financial support (economically, via tourism) of the Egyptian regime.²³

10. There was a surge of AJ activity in 1998.²⁴ Arrests were made in Cairo,²⁵ and plots to strike tourist sites, to assassinate a number of public figures,²⁶ and to kidnap foreigners in order to barter for jailed extremist leaders, were subsequently uncovered.²⁷ In 1998, arrests in Albania led to the extradition of three AJ members, reportedly with the assistance of the American authorities to Egypt.²⁸

11. On August 5, 1998, a statement from AJ vowed to take revenge on the United States for the extradition of its members from Albania to Egypt. The press release stated, "We wish to tell the Americans that we received their message, and a reply is now being prepared. We hope they will read it very carefully because we will, God willing, write it in a language they understand".²⁹ This statement was issued 48 hours before the bombing of the United States embassies in Nairobi, Kenya and Dar

²³ Reference A11 p.2.

²⁴ Reference A17 p.1.

²⁵ References A18, A19.

²⁶ Reference A17 p.1.

²⁷ Reference A20 p.1.

²⁸ Reference A21 pp.1-3.

²⁹ References A22 p.1, A23 pp.1-2.

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es Salaam, Tanzania, which killed over 200 people and injured more than 5,000.³⁰

Intelligence agencies have uncovered reliable evidence pointing to the involvement of AJ in the bombings. Intelligence sources in the United States have asserted that the Liberation Army for Holy Sites organization, which claimed credit, is synonymous with the AJ.³¹

ii) The Vanguard of Conquest (VOC)

12. The VOC was created in 1993 as a faction of the AJ.³² Abboud al-Zummar, the founder of the original AJ group, is a VOC leader and is currently incarcerated in Egypt.³³ Kamal Ojaisa (also known as Ahmad Husayn Ujayzah or Kamal Ujayzah alias Ahmed Hussein Mustafa Kamel Egaizah alias Abdel Hameed alias Ahmad Husayn Kamel Agiza)³⁴ is another leading figure in the VOC with close links to AJ-Zawahiri.³⁵ He is based in Tehran, Iran.³⁶

³⁰ References A24 p.1, A25 p.1.

³¹ References A26 and A27.

³² References A52, A55 p.5, A62, A72 p.2.

³³ References A3 p.3, A9 p.11, A41 p.3.

³⁴ References A33 p.2, A34, A83 p.1, A88 p.1.

³⁵ Reference A56 p.1.

³⁶ Reference A89 p.1.

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13. In 1993, the newly-formed VOC³⁷ carried out two assassination attempts. In August, Egyptian Interior Minister Hasan al-Alfi was wounded in a Cairo bomb attack, and five others were killed. In November, Egyptian Prime Minister Aref Sedki survived another bomb attack, but a teenage girl was killed and eighteen others were wounded.³⁸ In the wake of these failed efforts, roughly 800 VOC members were arrested and tried,³⁹ and El-Serri was sentenced to death in absentia.⁴⁰ In 1995, the VOC claimed responsibility for a June assassination attempt on Egyptian President Hosni Mubarak.⁴¹ In April of the same year, the VOC released a list of assassination targets, including a civilian woman who worked as a researcher at a center for political and strategic studies.⁴² Media reporting does not specify whether President Mubarak was on the list of targets as well. In September 1995, the VOC issued threats against Croatia and Egypt after the extradition from Croatia of an

³⁷ See footnote 2.

³⁸ References A11 p.1, A61 p.7, A62 p.1.

³⁹ References A63 p.2, A64 p.1.

⁴⁰ Reference A65 p.1.

⁴¹ Reference A66 p.1.

⁴² Reference A67.

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Al Gama'a al-Islamiya (AGAI)⁴³ member.⁴⁴ A similar threat was issued in December 1995 when Pakistan extradited Egyptian extremists.⁴⁵ These threats did not materialize into violence.

14. In 1996, the VOC threatened to attack Israeli and American interests over the bombing of South Lebanon,⁴⁶ though these attacks never materialized. In November 1997, after the Luxor killing of 58 tourists⁴⁷ by the AGAI, the VOC warned that orders had "already been given for attacks against Americans and Zionists not only in Egypt but elsewhere."⁴⁸ In February 1998, it was reported that the AJ was one of the signatories to a *fatwa*, or religious ruling, sponsored by terrorist financier Osama Bin Laden, that explicitly justifies attacks on United States

⁴³ The AGAI is the largest Egyptian terrorist group in terms of size but the AJ is the leading (most active) Egyptian terrorist group. In 1981, the AJ and AGAI leaders agreed on a merger. Between 1982 and 1983, differences developed between AJ and the AGAI, resulting in the dissolution of their merger. Notwithstanding these differences between AJ and the AGAI, there is evidence of some collaboration between the two, and there are reports that their tactical differences are disappearing. References A1 p.6, A2 p.2, A9 p.2, A10 p.1, A13 p.2, A27.

⁴⁴ Reference A68.

⁴⁵ Reference A69.

⁴⁶ Reference A70.

⁴⁷ In November 1997, six Muslim militants dressed in black sweaters similar to the winter uniforms of the Egyptian police got out of a car and fired on foreign tourists in Luxor, Egypt, killing 58 foreigners and four Egyptians (including two policemen). The Islamic group which claimed responsibility for the attack, said that it had not intended to kill the victims, but had planned to take them hostage to force the United States to release its leader, Sheikh Omar Abd-al-Rahman, from a New York federal prison. Reference A71 p.1.

⁴⁸ Reference A71 p.2.

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civilians anywhere in the world.⁴⁹ In March 1998, the VOC encouraged the development and expansion of Osama Bin Laden's⁵⁰ World Islamic Front for Jihad Against Jews and Americans (WIF).⁵¹ Months later, on August 7, 1998, the American embassies in Dar es Salaam, Tanzania and Nairobi, Kenya were bombed killing over 200 people and injuring more than 5,000.⁵² In December 1998, the United States was again the subject of a VOC communiqué during Operation Desert Fox (United States and United Kingdom air raids against Iraq), when the group urged Islamists to "punish the USA for its arrogance."⁵³

15. In 1999, the activities of the VOC received increased media coverage. This occurred first in respect of the so-called "Returnees from Albania"⁵⁴ trial in Egypt. This was a prosecution for inciting violent operations in Egypt and for setting up camps in foreign states to train the organization's element in military operations with a view to carrying out terrorist operations in the country.⁵⁵ Eighty-seven of the

⁴⁹ References A100 pp.1-3, A101, A102 pp.1-3, A111.

⁵⁰ There are several references to Bin Laden in this report.

⁵¹ Reference A72 p1.

⁵² References A24 p.1, A25 p.1, A26.

⁵³ Reference A73 p.4.

⁵⁴ The name "Returnees from Albania" refers to the fact that most of the defendants in the trial were Egyptian terrorists arrested and accused in Albania and extradited back to Egypt.

⁵⁵ Reference A73 p.1, A74 p.1.

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107 accused found guilty were AJ / VOC members.⁵⁶ Muhammad Zaki Muhammad MAHJUB (MAHJUB), the subject of the current report, was indicted in the trial and sentenced in absentia to 15 years imprisonment.⁵⁷ The AJ and the VOC issued separate threats of revenge in response to the verdicts handed down in April 1999.⁵⁸ In May 1999, the extradition of Hasan Ahmad Rabi' from Kuwait to Egypt again raised the profile of the group. Rabi' is a leading figure in the VOC organization, and is suspected of having been involved in the 1995 bombing of the Egyptian Embassy in Islamabad, Pakistan.⁵⁹

B. ORGANIZATION AND STRUCTURE

16. The AJ is currently the leading terrorist group in Egypt with membership estimated at several thousand hard-core members and several thousand sympathizers among its various factions.⁶⁰ The AJ leadership is largely university-educated with middle-class backgrounds⁶¹ and its membership includes Afghan Arabs and men with military experience. It is composed of small, tightly compartmentalized

⁵⁶ References A74 pp.1-2, A75, A76 p.1.

⁵⁷ Reference A76 p.1.

⁵⁸ References A75, A77 p.1, A78 p.1.

⁵⁹ Reference A80.

⁶⁰ References A9 p.2, A27.

⁶¹ Reference A9 p.3.

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cells.⁶² The AJ was led until recently by Ayman Al-Zawaheri and Muhammad Shauqi Al-Islambouli, the brother of Sadat's assassin.⁶³ At the end of January 2000, media reports mentioned that Al-Zawaheri stepped out as the AJ leader and lawyer Salah Shihatah is expected to succeed Al-Zawaheri.⁶⁴

17. Most of the AJ leadership living abroad is believed to be in Afghanistan, Pakistan or Sudan, but some reside in Great Britain and elsewhere in Western Europe. These leaders provide finances and plans for operations which are mainly carried out in Egypt.⁶⁵ The list of leaders residing abroad includes Adel Abdel-Meguid Abdel Bari, Yasser Tawfik El-Serri, Tharwat Salah Shihatah, Adel al-Sayyid Abd-al-Quddus, Ahmed Ibrahim Assyed al-Najjar, Murjan Mustafa Salim and Hani al-Sibai.⁶⁶ Amir Al-Zawaheri, the former leader of the AJ, has lived in Pakistan, Yemen and Sudan. Presently, he is located in Afghanistan along with Murjan Mustafa Salim, and Tharwat Salah Shihatah.⁶⁷

⁶² References A1 p.2, A3 p.3.

⁶³ References A6, A9 p.2 and paragraph 6.

⁶⁴ References A113 p.1, A114, A115 p.1.

⁶⁵ Reference A3 p.4.

⁶⁶ References A28 p.2, A29 pp.2-3.

⁶⁷ References A30, A31 pp.1-2.

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18. The AJ is active in Afghanistan, Britain, Denmark, Pakistan, Saudi Arabia, Singapore, Sudan, Switzerland, Syria, Turkey, Yemen and the United States.⁶⁸ During the last ten years, the AJ has also worked to establish infrastructures throughout Central and South America.⁶⁹ In addition, an AJ network in East Africa was established in 1995 at the request of AJ-Zāwāheri by Ali al Rashidi who died in 1996, and was replaced by Kamal Ojaisa. Currently, Kamal Ojaisa (also known as Ahmad Husayn Ujayzah or Kamal Ujayzah alias Ahmed Hussein Mustafa Kamel Egaizah alias Abdel Hameed alias Ahmad Husayn Kamil Agiza) is a leader of the VOC.⁷⁰ In 1998, arrests of AJ members in Albania underscore that this Balkan country has become a logistical base for AJ and a sanctuary for AJ activists.⁷¹

19. Britain is known as a base for funding and financial transfers, and as an investment region for the AJ.⁷² Several London-based AJ members are alleged to have conspired in Britain to stage terrorist attacks in Egypt and to raise funds in Britain for terrorist operations. They include Adel Abdel-Meguid Abdel Bari, who was sentenced to death in absentia by an Egyptian military tribunal for conspiring to

⁶⁸ Reference A32.

⁶⁹ Reference A26.

⁷⁰ References A33 p.2, A34, A40 p.2, A83 p.1, A88 p.1. See paragraph 12.

⁷¹ Reference A21 pp.1-2.

⁷² Reference A37 p.4.

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have a booby-trapped car explode in Cairo's Khan El-Khalili bazaar in 1995.⁷³

Mustafa Kamal (also known as Abu Hamza El-Masri);⁷⁴ Akram Abdel Aziz Sherif,

alleged to have been the liaison officer between AJ cells abroad and those in Europe;⁷⁵

lawyer Hani al-Siba'i, said to control AJ's media activities in Britain;⁷⁶ and Yasser

Tawfik El-Serfi, also known as Abu-Ammar,⁷⁷ condemned to death for a 1993 failed

assassination attempt on Egyptian Prime Minister Atef Sedki.⁷⁸ In one case, an

individual used a forged passport to enter Britain.⁷⁹ Several claimed political asylum⁸⁰

and some have obtained British citizenship.⁸¹ These AJ members manage a variety of

Islamic organizations, primarily in London, some of which are considered fronts for

the AJ organization.⁸²

⁷³ References A35 p.1, A36.

⁷⁴ Reference A35 p.1.

⁷⁵ Reference A36.

⁷⁶ Reference A40 p.1.

⁷⁷ Reference A37 p.1.

⁷⁸ Reference A38.

⁷⁹ References A35 p.1, A37 p.1, A39.

⁸⁰ References A35 p.1, A36, A39.

⁸¹ References A35 p.1, A37 p.1.

⁸² References A39, A40 p.1.

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20. AJ terrorist training camps are located in Sudan, Bosnia and Afghanistan.⁸³ In Sudan and Bosnia, AJ camps are financed by Saudi dissident and terrorist financier, Osama Bin Laden.⁸⁴ In addition, Al-Zawaheri has met with leaders of Sudanese, Eritrean, Ugandan, Yemeni and Egyptian Islamic groups. In May of 1998, these leaders agreed to build training camps in new areas inside Sudan.⁸⁵ One example of AJ members training in the United States has also been uncovered.⁸⁶

C. METHODS OF OPERATION

21. The AJ has traditionally concentrated on infiltrating the Egyptian army, police and security services in order to carry out dramatic assassinations of high-profile government figures.⁸⁷ The AJ strategy is to infiltrate the regime's power base in order to sabotage its ability to control events, as well as to invoke sympathy and support for the AJ's cause among the rank and file.⁸⁸ The AJ has traditionally

⁸³ References A17 p.3, A41 pp.3-4, A42 pp.1-3.

⁸⁴ References A17 p.3, A41 pp.3-4.

⁸⁵ Reference A43.

⁸⁶ In September 1998, a United States wildlife officer pleaded guilty to lying to the FBI about providing military training to eight followers of Sheikh Rahman in the handling of assault rifles, commando-style shooting, hand-to-hand combat, the martial arts and night assaults at his Pennsylvania farm in 1993. Five of the eight were later convicted of plotting to bomb the United Nations and Lincoln and Holland tunnels and the George Washington bridge, and of planning the assassination of Egyptian President Hosni Mubarak. Reference A44.

⁸⁷ References A1 pp. 1 and 3, A5 p.2, A6.

⁸⁸ Reference A1 p.5.

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focused its attacks in Cairo, but also claims to have acted abroad.⁸⁹ The AJ primarily targets Egyptian government officials for assassination, but also has identified the United States as a target.⁹⁰ The group disdains political organizing and focuses on enacting change through violence. The AJ rationalizes that even bystanders and innocent civilians must be sacrificed.⁹¹ In 1993, Al-Zawaheri called for plans to begin large-scale suicide attacks, stating "We call it martyrdom".⁹²

22. The AJ favours clandestine work,⁹³ and observes a strict code of secrecy including a high level of security consciousness reinforced by military efficiency.⁹⁴ In interviews and in claiming credit for terrorist activities, AJ is not eager to reveal the names of its members, preferring instead to use *noms de guerre* in communiqués.⁹⁵ AJ also resorts to trickery in order to conceal the whereabouts of its leaders. A 1994 press release claimed Al-Zawaheri had received political asylum in

⁸⁹ References A1 p.6. A3 p.2.

⁹⁰ Reference A24 p.1.

⁹¹ Reference A42 p.2.

⁹² Reference A42 p.2.

⁹³ Reference A13 p.1.

⁹⁴ Reference A9 pp.11-12.

⁹⁵ Reference A22 p.1.

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Switzerland, while in 1996, information was leaked pointing to his presence in Bulgaria. Both actions were attempts to conceal his actual presence in Sudan.⁹⁶

23. In support of its clandestine actions, AJ members use aliases and forged documents, particularly passports. Al-Zawaheri has two aliases, Abu-Mahommad and Abu Fatimah, and carries an Egyptian passport. He also possesses, however, a Swiss passport in the name of Amin Uthman, and a Dutch passport in the name of Mohamed Hifnawi. Yasser Tawfik El-Serri and Adel Abdel-Meguid Abdel Bari have passports from Egypt, certain European countries and other Arab nations.⁹⁷

24. The AJ also infiltrates humanitarian non-governmental organizations (NGOs) as a means of disguising, and assisting, the group's clandestine activities. The involvement of Ahmed Said Khadr⁹⁸ (a suspect in the 1995 bombing of the Egyptian Embassy in Pakistan),⁹⁹ with Human Concern International is one example of AJ infiltration. Another example is the involvement of three AJ members (deported from Albania in June 1998) with the Islamic Revival Foundation (al-

⁹⁶ References A30, A45.

⁹⁷ References A37 p.1, A46 pp.1-2.

⁹⁸ For more information on Khadr see footnote 144 and paragraphs 37 and 38.

⁹⁹ References A14, A15. See footnote 144 and paragraphs 37.

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Haramain Islamic Organization).¹⁰⁰ One of these three was also the director of another NGO, the Foundation for the Rebirth of Islam's Heritage, which has links to Osama Bin Laden.¹⁰¹

D. EXTERNAL SUPPORT

25. There is compelling evidence that radical Islamists are receiving considerable foreign support and assistance. Egypt has publicly accused foreign governments, primarily Iran¹⁰² and Sudan, of providing training, weapons, funding, logistical support and spiritual guidance to the militants.¹⁰³ Media reports indicate that Iran provides funding and logistical training to radical Islamic groups such as the AJ.¹⁰⁴ In Afghanistan, AJ members are trained at the Al-Khalifah or Caliphate camp by Iranians and equipped with powerful explosives.¹⁰⁵ AJ leaders Al-Zawaheri and Muhammad Shauqi Al-Islambouli have received large sums of money from Iran¹⁰⁶ and intense secret contacts have taken place between top Iranian intelligence officers, Bin

¹⁰⁰ A search of their apartments and office, revealed a Kalashnikov rifle and official government stamps useful for producing false documents. References A21 pp.1-2, A48 pp.1-3.

¹⁰¹ Reference A21 p.2.

¹⁰² Reference A49 p.4

¹⁰³ Reference A3 p.3.

¹⁰⁴ Reference A3 p.3.

¹⁰⁵ References A41 pp.3-4, A42 p.1.

¹⁰⁶ Reference A42 p.3.

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Laden and Al-Zawaheri.¹⁰⁷ In 1998, VOC leader Kamal Ojaisa held a series of meetings with officials in Tehran and with the Sudanese Intelligence Service of the National Islamic Front in Khartoum.¹⁰⁸

26. A 1998 agreement between Al-Zawaheri and leaders of Sudanese, Eritrean, Ugandan, Yemeni and Egyptian Islamic groups established budgets for financing international terrorist operations and plans to mobilize officials in Sudan's embassies in London, Sanaa, New York, Rome, Karachi and Mogadishu. These leaders also agreed at the meeting to open Sudan's doors to international Islamic fundraising organizations and to facilitate the movement of extremists by providing them with Sudanese diplomatic passports.¹⁰⁹

27. The AJ is also funded directly by Osama Bin Laden. Al-Zawaheri met with Bin Laden in 1996, and an agreement to receive funds for terrorist operations was reached.¹¹⁰ Islamic charity organizations which have direct associations with Bin Laden are found in Belgium, the Netherlands and Luxembourg; three countries from

¹⁰⁷ Reference A49 p.4.

¹⁰⁸ References A33 p.2, A40 p.2.

¹⁰⁹ Reference A43.

¹¹⁰ References A26, A50 pp.2-3.

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which, through these charitable organizations, AJ obtains important financial and logistical support.¹¹¹

E. LINKS TO KEY ISLAMIC ORGANIZATIONS AND FIGURES

28. The AJ has a history of close links to Osama Bin Laden.¹¹² A relationship between Bin Laden and the leadership of AJ has been developing since 1989 and has gone beyond the bounds of financing to take on a form of universality of purpose.¹¹³ Al-Zawaheri and Bin Laden have been inseparable since they first met and are said to have nothing but admiration for each other's roles.¹¹⁴ Al-Zawaheri personally swayed Bin Laden towards the fundamentalist way of thinking, which places the methods of military action above the methods of propaganda and advocacy for the cause.¹¹⁵ Since the attacks on the United States embassies in Kenya and Tanzania, in respect of which Bin Laden and his collaborators are prime suspects, and the subsequent American retaliatory strikes against Afghanistan and Sudan, Al-Zawaheri has assumed the tasks of contacting news agencies, issuing threats against

¹¹¹ Reference A51 pp.3-5.

¹¹² Reference A6.

¹¹³ Reference A41 p.1.

¹¹⁴ Reference A41 pp.1-2.

¹¹⁵ Reference A41 p.2.